

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>In Re:</b>		<b>: Chapter 13</b>
		<b>:</b>
<b>Donna O. Rismay</b>	<b>Debtor</b>	<b>: No: 19-13369- MDC</b>
<b>Quicken Loans, LLC Formerly Known (FKA)</b>		<b>:</b>
<b>as Quicken Loans, Inc.</b>	<b>Movant</b>	<b>:</b>
<b>vs.</b>		<b>:</b>
<b>Donna O. Rismay,</b>	<b>Debtor</b>	<b>:</b>
<b>William C. Miller, Esquire,</b>		<b>:</b>
	<b>Trustee</b>	<b>:</b>

**Debtor Donna Rismay's Response to the Motion of Quicken Loans, LLC  
Formerly Known as Quicken Loans, Inc's Motion for the Relief from the  
Automatic Stay Under Section 362 of the U.S. Bankruptcy Code**

And Now comes the Debtor, Donna Rismay, and by and through her undersigned Vaughn A. Booker, Esquire and in support of his Response to the Motion for Relief from the Automatic Stay filed by the Creditor Quicken Loans, LLC formerly known (FKA) as Quicken Loans, Inc., and prays your Honorable Court as follows:

1. Denied. After reasonable investigation, the Debtor is without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph.
2. Admitted.
3. Denied. After reasonable investigation, the Debtor is without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph.
4. Admitted.
5. Denied. After reasonable investigation, the Debtor is without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph.

6. Denied. **It is specifically denied that the Debtor has failed to make Post-Petition payments in the amounts of \$614.47 for the months of May 2021 through July 2021, as alleged. Strict proof to the contrary is demanded at Trial.**

7. Denied. The Debtor specifically denies that the they owe \$1,820.03, as alleged.

8. Denied.

9. Denied. After reasonable investigation, the Debtor is without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph.

10. Denied. After reasonable investigation, the Debtor is without knowledge or information sufficient to form a belief as to the truth of the averments contained in this paragraph.

Wherefore, for all of the foregoing reasons, the Debtor Donna Rismay prays your Honorable court to deny and dismiss the Creditor Quicken Loans, LLC formerly known (FKA) as Quicken Loans, Inc's Motion for Relief from the Automatic Stay.

**Respectfully Submitted:**

/s/ Vaughn A. Booker, Esquire  
**Vaughn A. Booker, Esquire**  
**Attorney for Debtor,**  
**Donna Rismay**

**Dated July 30, 2021**

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<b>Donna O. Rismay,</b>	<b>Debtor</b>	:
<b>William C. Miller, Esquire,</b>		:
	<b>Trustee</b>	
<hr/>	:	

**ORDER**

And Now to wit, this            day of            , 2021 and based upon the within Response of the Debtor Donna Rismay to the Motion for Relief from the Automatic Stay under Section 362 (a) of the Creditor Quicken Loans, LLC formerly known (FKA) as Quicken Loans, Inc., it is Hereby Ordered and Decreed that the Motion is Denied.

**By the Court:**

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J.